

Macco & Stern LLP
Proposed Attorneys for the
Debtors and Debtors-in-Possession
135 Pinelawn Road, Suite 120 South
Melville, NY 11747

Hearing Date: March 11, 2015
Time: 11:00 a.m.

Objections Due: March 9, 2015
Time: 4:00 p.m.

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

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In re: Chapter 11

Medford Development Corp.	Case No. 14-75666 (AST)
Motor Parkway Enterprises Inc.	Case No. 14-75667 (AST)
Airport Development Corp.	Case No. 14-75683 (AST)
Wheeler Development LLC	Case No. 14-75668 (AST)
Smithtown Development Corp.	Case No. 14-75669 (AST)
Brentwood Development Corp.	Case No. 14-75670 (AST)
Holbrook Development Corp.	Case No. 14-75671 (AST)
Carman Development Corp.	Case No. 14-75672 (AST)
Maple Avenue Hauppauge Dev. Corp.	Case No. 14-75674 (AST)
Port Jefferson Development Corp.	Case No. 14-75675 (AST)
Ronkonkoma Development Corp.	Case No. 14-75676 (AST)
Islandia Development Corp.	Case No. 14-75677 (AST)
Oceanside Enterprises Inc.	Case No. 14-75678 (AST)
Islip Development Corp.	Case No. 14-75679 (AST)
Westbury Enterprises Inc.	Case No. 14-75680 (AST)

Debtors. (Jointly Administered)

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Medford Development Corp., et al.,

Plaintiffs, Adv. Pro. No. 15-08020 (AST)

- against -

Cumberland Farms, Inc., and Gulf Oil Limited
Partnership,

Defendants.
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**NOTICE OF MOTION FOR ENTRY OF AN
ORDER STAYING THE DISTRICT COURT ACTION**

PLEASE TAKE NOTICE, that, by the motion (the “Motion”), dated March 3, 2015, Medford Development Corp. and its affiliated entities (collectively, “Debtors”),¹ the above-referenced debtors and debtors-in-possession, by and through their counsel, Macco & Stern, LLP, will move before the Honorable Alan S. Trust, United States Bankruptcy Judge, Eastern District of New York, at the Courthouse located at 290 Federal Plaza, Central Islip, New York, Room 960, on **March 11, 2015 at 11:00 a.m.** or as soon thereafter as counsel may be heard, for an order pursuant to 105(a) and 362 of title 11 of the United States Code (the “Bankruptcy Code”) staying the action entitled *Cumberland Farms, Inc., and Gulf Oil Limited Partnership v. Steven Keshtgar, Shoreh Keshtgar, Cedarhurst Development Corp., John Doe Corporations 1 Through 10, and John and Jane Does 1 Through 1*, assigned index number 15-CV-00580 (LDW) (AKT) (the “District Court Action”), currently pending the United States District Court for the Eastern District of New York.

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the relief sought in the Motion must conform to the Bankruptcy Rules and Local Bankruptcy Rules for the Eastern District of New York, as modified by any administrative orders entered in this case, and be filed with the Bankruptcy Court electronically in accordance with General Order 461, be registered users of the Bankruptcy Court’s filing system and, by all other parties in interest, on a 3.5 inch disk, in portable document format (PDF), WordPerfect, Microsoft Word DOS text (ASCII) or a scanned imaged of the filling, with a hard copy delivered directly to Chambers, and may be served in accordance with General Order 462, and upon (i) counsel to the Debtor, Macco & Stern, LLP, 135 Pinelawn Road, Suite 120 South, Melville, New York 11747; and (ii) the Office

¹ The Debtors, with associated case numbers, are as follows: (1) Medford Development Corp.; (2) Motor Parkway Enterprises, Inc.; (3) Airport Development Corp.; (4) Wheeler Development LLC; (5) Smithtown Development Corp.; (6) Brentwood Development Corp.; (7) Holbrook Development Corp.; (8) Carman Development Corp.; (9) Maple Avenue Hauppauge Dev. Corp.; (10) Port Jefferson Development Corp.; (11) Ronkonkoma Development Corp.; (12) Islandia Development Corp.; (13) Oceanside Enterprises Corp.; (14) Islip Development Corp.; and (15) Westbury Enterprises Inc.

of the United States Trustee, 560 Federal Plaza, Central Islip, New York 11722, so as to be received no later than **March 11, 2015 at 4:00 p.m.**

Dated: March 4, 2015
Melville, NY

MACCO & STERN, LLP
Attorneys for the Debtors

By: _____

Michael J. Macco
A Member of the Firm
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